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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 JOHN DOE,

11 NO.: 22cv08685- BLF

12 Plaintiff,

13 v.

14 DEPARTMENT OF JUSTICE OF THE STATE
15 OF CALIFORNIA, STATE OF CALIFORNIA,
CITY OF SUNNYVALE, OFFICER JOHN
BOGNANNO, and DOES 1 to 50,

16 Defendants.
**STIPULATED PROTECTIVE
ORDER ALLOWING JOHN DOE
TO PROCEED USING A
PSEUDONYM AND REQUIRING
THE PARTIES TO FILE
DOCUMENTS REVEALING HIS
TRUE IDENTITY WITH
APPROPRIATE REDACTIONS**

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**STIPULATION AND PROTECTIVE ORDER RE: USAGE
OF DOE IDENTIFIER**

22cv08685- BLF

1 IT IS HEREBY STIPULATED AND AGREED, by the undersigned attorneys for the
 2 respective parties, that Plaintiff John Doe may proceed in the above-captioned case using a
 3 pseudonym. Mr. Doe has requested this accommodation because he was accused of committing a
 4 misdemeanor requiring sex offender registration but the charges were later dismissed.

5 It is further agreed that all documents filed in this case which reference or refer to John
 6 Doe's true identity or identifying information shall be redacted in order to protect John Doe's
 7 reputation. The information to be redacted is as follows: name, date of birth, social security
 8 number, current address, past addresses, and the case number of any state court criminal
 9 proceeding or California Tort Claims Act claim form.

10 This stipulated protective order applies to: any pleading, motion, declaration, affidavit, or
 11 exhibit filed in this case.

12 Plaintiff has informed Defendants of John Doe's true identity. In order to protect John
 13 Doe's reputation, the parties agree that any document revealing his identity will be redacted, with
 14 an unredacted copy emailed (the same day) to the Court and all parties.

15 This protective order shall be without prejudice as to the right of any party to oppose
 16 production of any information or object to its admissibility into evidence.

17 If either party believes a document has been redacted improperly, the parties will make
 18 good faith efforts to resolve the issue without the assistance of the Court. In the event the parties
 19 cannot resolve the dispute, the party disputing the use of redaction may file a motion to remove
 20 redactions.

21 The parties agree to make all good faith best efforts to carefully review all documents filed
 22 in this case or used at trial to ensure that any identifying information is appropriately redacted.

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STIPULATION AND PROTECTIVE ORDER RE: USAGE OF 22cv08685-BLF
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1 After the termination of this case, the provisions of this protective order shall continue to be
2 binding.

3 SO STIPULATED.
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5 Dated: April 27, 2023

6 /S/ MICHAEL MILLEN
MICHAEL MILLEN, ESQ.

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8 ROB BONTA
9 Attorney General of California
10 CATHERINE WOODBRIDGE
Supervising Deputy Attorney General

11 Dated: April 27, 2023

12 /S/ AMY W. LO
AMY W. LO
13 Deputy Attorney General
14 *Attorneys for State of California*
15 *acting by and through the*
Department of Justice

16 ALLEN, GLAESSNER,
17 HAZELWOOD & WERTH, LLP

18 Dated: April 27, 2023

19 /S/ KEVIN ALLEN
KEVIN P. ALLEN
20 Attorneys for Defendant
21 CITY OF SUNNYVALE AND
22 OFFICER
JOHN BOGNANNO

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28 **STIPULATION AND PROTECTIVE ORDER RE: USAGE OF 22cv08685-BLF**
DOE IDENTIFIER

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ORDER

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Finding that the public will not be prevented from observing this Court's proceedings or
3 rulings by implementation of the parties' stipulated protective order, it is ORDERED that the
4 above stipulated protective order go into effect immediately.

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Dated: April 28, 2023

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BETH LABSON FREEMAN
UNITED STATES DISTRICT COURT JUDGE